



**Wickes Companies, Inc.**  
Corporate Offices

53  
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NOV 12 1985

November 8, 1985

SUPERFUND BRANCH

Mr. Anthony Donatoni  
Hazardous Materials Branch  
Region III  
6th and Walnut Streets  
Philadelphia, Pennsylvania 19106

Mr. Thomas B. Golz  
Waste Management Branch  
Region V  
230 South Dearborn Street  
Chicago, Illinois 60604

Mr. Robert L. Morby  
Hazardous Materials Branch  
Region VII  
324 East 11th Street  
Kansas City, Missouri 64106



R00307834  
RCRA RECORDS CENTER

Re: EPA STANDARDS APPLICABLE TO OWNERS AND OPERATORS OF  
HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL  
FACILITIES: CORPORATE GUARANTEE OF CLOSURE AND POST  
CLOSING CARE

Gentlemen:

Enclosed are the following documents furnished to you in accordance with the EPA Regulations regarding the obligation of Wickes Manufacturing Company (formerly Gulf + Western Manufacturing Company) to provide financial assurance that, at such time as any of the affected facilities close, sufficient funds will be available to insure that all hazardous waste on-site will be removed or disposed of in accordance with the regulation:

1. Corporate Guarantee by Wickes Companies, Inc. of the obligations of its subsidiary, Wickes Manufacturing Company.
2. Letter from the Chief Financial Officer of Wickes Companies, Inc., Mr. Wilhelm A. Mallory.
3. Report from Wickes Companies, Inc.'s independent auditors, Arthur Andersen & Co.
4. Certificate of Liability Insurance.

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USEPA, RCRA Branch

Page Two  
Region V

EPA STANDARDS: CLOSURE/POST CLOSURE CARE

5. Annual Report of Wickes Companies, Inc., for its most recent fully-completed year which ended January 26, 1985, which contains copies of the certified financials of Wickes Companies, Inc.

If you have any questions concerning the enclosed, please contact Mr. Michael J. Bauer, Resident Counsel, Wickes Manufacturing Company, P.O. Box 999, 26261 Evergreen Road, Southfield, Michigan 48037, telephone number (313) 355-8105.

Very truly yours,

WICKES COMPANIES, INC.



Kurt E. Matthews  
Associate Counsel

KEM:mt  
Enclosures



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324 East 11th Street  
Kansas City, Missouri 64106

Gentlemen:

I am the Chief Financial Officer of Wickes Companies, Inc. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: None.

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

BUMPER DIVISION-GRAND RAPIDS PLANT  
WICKES MANUFACTURING COMPANY  
1860 Alpine Avenue, N.W.  
Grand Rapids, Michigan 49504  
EPA ID NO. MID055850127  
ESTIMATED CLOSURE COST: \$314,800.00  
ESTIMATED POST-CLOSURE COST: \$180,000.00

MECHANICAL COMPONENTS DIVISION  
WICKES MANUFACTURING COMPANY  
90-96 Railroad Street  
Mancelona, Michigan 49659  
EPA ID NO. MID060178688  
ESTIMATED CLOSURE COST: \$147,000.00  
ESTIMATED POST-CLOSURE COST: \$180,000.00

ELCO-HUNTINGDON  
ELCO CORPORATION  
Huntingdon Industrial Park  
Huntingdon, Pennsylvania 16652  
EPA ID NO. PAD00409462  
ESTIMATED CLOSURE COST: \$38,000.00

EAGLE SIGNAL CONTROLS DIVISION  
WICKES MANUFACTURING COMPANY  
736 Federal Street  
Davenport, Iowa 52803  
EPA ID NO. IAD051001337  
ESTIMATED CLOSURE COST: \$0  
ESTIMATED POST-CLOSURE COST: \$0

3. In states where EPA is not administering the financial requirements of Subpart H of CFR Parts 264 or 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

BOHN ALUMINUM & BRASS DIVISION  
WICKES MANUFACTURING COMPANY  
Route #4, Post Office Box 387  
Greensburg, Indiana 47240  
EPA ID NO. IND052959640  
ESTIMATED CLOSURE COST: \$79,000.00  
ESTIMATED POST-CLOSURE COST: \$180,000.00

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State Mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None.

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends the last Saturday in January. The figures for the following items marked with an asterisk (\*) are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended January 26, 1985.

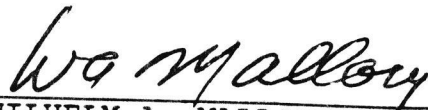
#### ALTERNATIVE I

1. Sum of current closure and post-closure cost estimates	\$ 1,118,800
*2. Total liabilities	972,675,000
*3. Tangible net worth (Note A)	340,333.000
*4. Net worth	340,333.000
*5. Current assets	930,901,000
*6. Current liabilities	405,061,000
7. Net working capital (line 5 minus line 6)	525,840,00
*8. The sum of net income plus depreciation, depletion and amortization	339,171,000
*9. Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.)	N/A

	<u>YES</u>	<u>NO</u>
10. Is line 3 at least \$10 million?	<u>X</u>	_____
11. Is line 3 at least 6 times line 1?	<u>X</u>	_____
12. Is line 7 at least 6 times line 1?	<u>X</u>	_____
*13. Are at least 90% of firm's assets located in the U.S.? If not, complete line 14.	<u>X</u>	_____
14 Is line 9 at least 6 times line 1?	<u>N/A</u>	<u>X</u>
15. Is line 2 divided by line 4 less than 2.0?	_____	_____
16. Is line 8 divided by line 2 greater than 0.1?	<u>X</u>	_____
17. Is line 5 divided by line 6 greater than 1.5?	<u>X</u>	_____

Note A - Information regarding intangible assets not available.

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below.

  
\_\_\_\_\_  
WILHELM A. MALLORY  
Executive Vice President  
Wickes Companies, Inc.

November 8, 1985  
\_\_\_\_\_  
(DATE)